

## *EXHIBIT B*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both  
individually and as Legal Guardian of  
SHANE ALLEN LOVELAND, et al.,

Plaintiffs,

V.

THE GOODYEAR TIRE & RUBBER  
COMPANY,

Defendant.

Case No. 8:18-cv-00127

**DECLARATION OF EDWARD S. BOTT, JR., IN SUPPORT OF  
THE GOODYEAR TIRE & RUBBER COMPANY'S  
MOTION TO SUPPLEMENT ITS BRIEF IN SUPPORT OF ITS MOTION *IN LIMINE*  
TO EXCLUDE EVIDENCE PURSUANT TO THE  
SELF CRITICAL ANALYSIS PRIVILEGE**

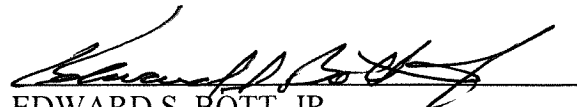
I, Edward S. Bott, Jr., declare as follows:

1. My name is Edward S. Bott, Jr. I understand the nature of this oath, and I am competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge, and the facts stated herein are true and correct.

2. A true and accurate copy of the document identified in The Goodyear Tire & Rubber Company's Motion to Supplement Its Brief in Support of Its Motion *in Limine* to Exclude Evidence Pursuant to the Self Critical Analysis Privilege is attached to Index in Support of The Goodyear Tire & Rubber Company's Motion to Supplement Its Brief in Support of Its Motion *in Limine* to Exclude Evidence Pursuant to the Self Critical Analysis Privilege.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 7<sup>th</sup> day of February, 2020, in St. Louis, Missouri.

  
EDWARD S. BOTT, JR.